

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

DAVID MANUEL ARRELLANO,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CASE NO. 5:19-cv-
	§	00094-C
GREAT LAKES EDUCATIONAL LOAN SERVICES, INC.,	§	
	§	
Defendant.	§	

**LAURIE N. PATTON AND HIERSCHE, HAYWARD, DRAKELEY & URBACH, P.C.
UNOPPOSED MOTION TO WITHDRAW
AS COUNSEL FOR PLAINTIFF DAVID MANUEL ARRELLANO**

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE:

COME NOW, Laurie N. Patton and Hiersche, Hayward, Drakeley & Urbach, P.C. (“HHDU”) (collectively, “Movants”), and file this Motion to Withdraw as Counsel for Plaintiff David Manuel Arrellano for the reasons respectfully stated herein:

BACKGROUND FACTS

1. On May 23, 2019, David Manuel Arrellano (“Plaintiff”) filed his Complaint against Great Lakes Education Loan Services for violation of the Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227 *et seq.* At the time of the filing of the Complaint, Joseph Scott Davidson was the lead attorney of record for Plaintiff. [Dkt 1]

2. On June 13, 2019, Jason M. Katz entered an appearance as counsel for the Plaintiff. Jason M. Katz is no longer employed by HHDU, but is now employed by Carrington, Coleman, Sloman & Blumenthal, L.L.P. [Dkt 7]

3. On September 30, 2019, Laurie N. Patton filed a Notice of Appearance on behalf of Plaintiff David Manuel Arrellano to appear as local counsel. [Dkt 13]

4. Plaintiff shall continue to be represented by Joseph Scott Davidson and Mohammed Omar Badwan of Sulaiman Law Group Ltd.

5. Plaintiff has also obtained new local counsel meeting the requirements of this Court and Laurie Patton desires to withdraw as counsel for Plaintiff. Nayeem Mohammed with the Law Offices of Nayeem N. Mohammed, located at 417 Misty Lane, Lewisville, Texas 75067 has appeared in this matter on December 17, 2019 and will continue as local counsel for Plaintiff. [Dkt. 18]

RELIEF REQUESTED

6. Movants respectfully request that the Court enter an order allowing them to withdraw as counsel for David Manuel Arrellano.

CONCLUSION

7. For the reasons set forth herein, Movants respectfully request that the Court grant this Motion and enter an order allowing them to withdraw as counsel of record for Plaintiff David Manuel Arrellano.

Dated: December 20, 2019.

Respectfully submitted,

HIERSCHE, HAYWARD, DRAKELEY & URBACH, P.C.

By: /s/ Laurie N. Patton
Laurie N. Patton (SBN: 24078158)

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**LOCAL COUNSEL FOR
PLAINTIFF DAVID MANUEL ARRELLANO**

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(b), on December 20, 2019, I conferred with Mark McBrayer, counsel for Defendant, and he is not opposed to this Motion. Plaintiff is not opposed to this motion.

/s/ Laurie N. Patton
Laurie N. Patton

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on December 20, 2019, a true and correct copy of the above and foregoing document was filed with the court and served on all parties via CM/ECF.

/s/ Laurie N. Patton
Laurie N. Patton